

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VALARIE KAUR BRAR,

Plaintiff,

-against-

The CITY OF NEW YORK, THE HUDSON RIVER PARK TRUST, P.O. JOSE ANDRADE, P.O. WILLIAM HAUT, P.O. NEIL RODRIGUEZ, P.O. MICHAEL CARRIERI, P.O. TANISHA DIAZ, P.O. JASON WOLF, P.O. KATHLEEN CURNYN, SGT. ARTHUR SMARSCH, MAYOR MICHAEL BLOOMBERG, POLICE COMMISSIONER RAYMOND KELLY, CHIEF JOSEPH ESPOSITO, CHIEF NICHOLAS ESTAVILLO, ASST. CHIEF BRUCE SMOLKA, DEPUTY CHIEF THOMAS PURTELL, DEPUTY COMMISSIONER JOHN COLGAN, CHIEF PATRICK DEVLIN, INSP. THOMAS GRAHAM, DEPUTY CHIEF TERENCE MONAHAN, INSP. JAMES SHEA, DEPUTY INSP. THOMAS GALATI, CHIEF JAMES O'NEILL, INSP. JAMES ESSIG, LT. BRIAN JACKSON, DEPUTY COMMISSIONER STEPHEN HAMMERMAN, ASST. DEPUTY COMMISSIONER THOMAS DOEPFNER, LT. DANIEL ALBANO, DEPUTY INSPECTOR KERRY SWEET, SENIOR COUNSEL RUBY MARIN-JORDAN, SGT. EDMUND SHERIDAN, SGT. STEPHANIE MOUNT, LT. DANIEL IECAMPO, CAPT. JOSEPH DOWNING, CAPTAIN PAUL DEENTREMONT, and P.O.s JOHN and JANE DOE #1-50, individually and in their official capacities (the names John and Jane Doe being fictitious, as the true names are presently unknown),

05 CV 1572 (RJS)(JCF)

Defendants

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**AFFIDAVIT OF STEPHANIE MOUNT IN FURTHER SUPPORT OF  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

**STEFANIE MOUNT**, declares under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the following statements are true and correct:

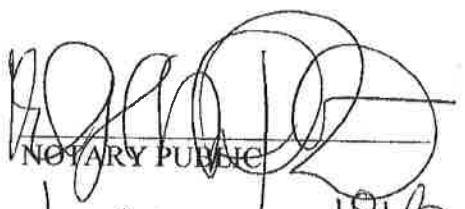
1. I am a retired Member of Service formerly with the New York City Police Department (“NYPD”). I was appointed to the NYPD in January, 1988 as a police officer and was promoted to the rank of Detective in June, 1999. In May, 2001, I was again promoted, to the rank of Sergeant. I served as a Sergeant during the 2004 RNC and until my retirement in July, 2008. During the RNC, I was one of the supervisors present at South William Street and Mill Lane on August 29, 2004 for the entire incident. As such, I have firsthand knowledge of the facts set forth below. I submit this Declaration in further Support of Defendants’ Motion for Summary Judgment.

2. I understand that individuals who were arrested at this location had subsequently filed lawsuits against the City of New York. In April, 2007, I was deposed in connection with one of those lawsuits (*Conley v. City of New York*) and questioned about arrests made at South William Street and Mill Lane. During that deposition, I was not questioned about Plaintiff Valarie Brar specifically.

3. It was not until approximately two months ago (when defense counsel contacted me) – almost ten years following Plaintiff’s arrest – that I had first learned of Plaintiff’s lawsuit or the fact that I was named as a defendant therein. To the best of my recollection, I was never served with a copy of the summons and complaint.

Dated: New York, New York  
July 18, 2014

  
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STEFANIE MOUNT

  
NOTARY PUBLIC  
Sworn to before me this 18 day  
of July, 20114

Elain Abraham-Rigo, Notary Public  
Registration No. 01AB4786620  
Qualified in Putnam County  
Commission Expires on 12/31/17